

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

APR 13 2022
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL WORSHAM,

Defendant.

4:22CR212 CDP/PLC

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

1. At all times relevant to this Indictment, Bank of America, Regions Bank, PNC Bank, Academy Bank, Morton Community Bank, and Rockwood Bank are financial institutions within the meaning of Title 18, United States Code, Section 20, because they are financial institutions insured by the Federal Deposit Insurance Corporation.

2. At all times relevant to this Indictment, loan applications made by the defendant, **MICHAEL WORSHAM** ("WORSHAM") to loan companies, banks and automotive groups were completed by means of interstate wire transfer.

THE SCHEME

3. Beginning on or about May 2019 to on or about September of 2021, the relevant time period, WORSHAM knowingly and intentionally devised and executed a scheme and artifice to defraud, and obtain money and property from individuals and banking institutions, by means of material false and fraudulent pretenses, representations and promises in that WORSHAM, without

the knowledge or authorization of victims, used personal identifying information of others to open fraudulent bank accounts, apply for loans, purchase vehicles, cash and deposit checks, and make deposits and withdrawals from ATM machines.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant WORSHAM utilized various internet websites to obtain previously stolen identities and then use that information to carry out fraudulent activity.

5. It was further part of the scheme that WORSHAM utilized the stolen identities to apply for loans at local automotive dealers and banks.

6. It was further part of the scheme that WORSHAM applied for loans online or over the telephone, and then appear in person to close the loan with local banks and automotive dealerships.

7. It was further part of the scheme that defendant WORSHAM utilized stolen or fictitious social security cards, paystubs, voided checks from other banking institutions and other fraudulent papers that he used to prove his false identity during fraudulent transactions.

8. Defendant WORSHAM, in order to avoid detection, utilized fictitious temporary Missouri driver's and non-driver's licenses and other Missouri Department of Revenue documentation. WORSHAM superimposed his own photo over the photograph on the temporary identification and utilize stolen identifiers of victims to make the license appear valid.

9. It was further part of the scheme that WORSHAM created fictitious bank accounts using stolen identities in order to utilize the account for further fraudulent loans, deposits and withdrawals.

10. Victims in the scheme frequently had their mail stolen from their mailboxes. The

stolen mail sometimes included checks and documents reflecting financial information. As a part of the scheme, the defendant and others known and unknown to the grand jury altered the checks taken from victims' mailboxes to add fictitious individuals to the "Pay to the Order of" line on negotiable instruments. The altered checks were then deposited into fraudulent accounts held by WORSHAM, or cashed by an unauthorized party.

11. Defendant WORSHAM, in order to avoid detection, fled from various establishments if authorities were called while he was applying for the fraudulent loan.

12. Defendant WORSHAM, in order to avoid detection, utilized fraudulent bank accounts that he opened using stolen identities in order to avoid the tracing of funds.

COUNT I
(Wire Fraud)

13. The Grand Jury realleges the facts set forth in paragraphs 1 through 12 as if fully set herein.

14. On or about September 29, 2020, in the Eastern District of Missouri, the defendant,

MICHAEL WORSHAM,

for the purpose of executing the scheme described above, fraudulently and without permission, did falsely represent himself to be D.Q., and provided the personal identifying information of D.Q. while attempting to purchase a vehicle at victim Dave Sinclair Buick GMC, located in the Eastern District of Missouri, for approximately \$17,841.00. Defendant Worsham's misrepresentation of his identity caused a background credit check to occur on unknowing victim D.Q. WORSHAM was not authorized to utilize the personal identifiers of D.Q. and did so in an attempt to fraudulently purchase a vehicle, and thus caused to be transmitted by means of wire communication in interstate commerce the signals and sounds from Dave Sinclair Buick GMC originating in the Eastern District of Missouri and terminating at Transunion servers in the Northern District of Illinois.

COUNT	DATE	WIRE TRANSMISSION
I	September 29, 2020	Credit Check transmission to Credit Bureau Transunion.

All in violation of, and punishable under, Title 18, United States Code, Section 1343.

COUNT II
(Wire Fraud)

15. The Grand Jury realleges the facts set forth in paragraphs 1 through 14 as if fully set herein.

16. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, a financial institution, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of attempting to execute the same, the defendant herein, did forge the signature of J.D. in an attempt to obtain a \$38,932.00 loan from Schicker Automotive, by means of causing a credit check report to be requested and submitted from the Eastern District of Missouri to Transunion, whose servers were located in the Northern District of Illinois, and financing application to Route One, whose servers were located in the District of Nevada. The results were then transmitted back from the servers in the District of Nevada and the Northern District of Illinois to the servers located in the Eastern District of Missouri.

COUNT	DATE	WIRE TRANSMISSION
II	July 19, 2021	Credit check transmission to Route One and Transunion.

In violation of Title 18, United States Code, Section 1343.

COUNT III
(Bank Fraud)

17. The Grand Jury realleges the facts set forth in paragraphs 1 through 16 as if fully set herein.

18. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, a financial institution, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the same, the defendant herein, did forge the signature of R.S. in order to obtain a \$10,000.00 loan from One Main Financial Group, and cashed and caused to be cashed the following checks:

COUNT	DATE	TRANSACTION
III	November 6, 2020	Check x1362, in the amount of \$10,000.00, payable to R.S. issued by One Main Financial and drawn on Bank of America Account number ending in x2252.

All in violation of Title 18, United States Code, Section 1344.

COUNT IV
(Bank Fraud)

19. The Grand Jury realleges the facts set forth in paragraphs 1 through 18 as if fully set herein.

20. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, a financial institution, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the same, the defendant

herein, did forge the signature of B.H. in order to obtain a \$6,000.00 loan from Mariner Finance, and deposited and caused to be deposited the following checks into other financial accounts:

COUNT	DATE	TRANSACTION
IV	December 19, 2020	Check x2608, in the amount of \$6,000.00, payable to B.H. drawn from PNC Bank Account number ending in x3454.

All in violation of Title 18, United States Code, Section 1344.

COUNT V, VI, VII, VIII
(Bank Fraud)

21. The Grand Jury realleges the facts set forth in paragraphs 1 through 20 as if fully set herein.

22. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, a financial institution, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the same, the defendant herein, did forge the signature of P.G. in order to obtain checks for \$8,000.37, \$13,088.44, \$26,840.00 and \$2,301.24 from Kokomo Joe's, and deposited and caused to be deposited the following checks into other financial accounts:

COUNT	DATE	TRANSACTION
V	July 30, 2021	Check x1525, in the amount of \$8,000.37, payable to Fox Valley Estate Corp. dba Patrick Gale drawn from the Kokomo Joe's Great Southern Bank Account ending in x0831.
VI	July 30, 2021	Check x1526, in the amount of \$13,088.44, payable to Fox Valley Estate Corp. dba Patrick Gale drawn from the Kokomo Joe's Great Southern Bank Account ending in x0831.
VII	July 28, 2021	Check x1524, in the amount of \$26,840.00, payable to Fox Valley Estate Corp. dba Patrick Gale drawn from the Kokomo Joe's Great Southern Bank Account ending in x0831.
VIII	July 30, 2021	Check x1523, in the amount of \$2,301.24, payable to Belson Texas Dist. dba Patrick Gale drawn from the Kokomo Joe's

	Account Great Southern Bank Account ending in x0831.
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All in violation of Title 18, United States Code, Section 1344.

COUNTS IX, X
(Bank Fraud)

23. The Grand Jury realleges the facts set forth in paragraphs 1 through 22 as if fully set herein.

24. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, a financial institution, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the same, the defendant herein, did forge the signature of D.O. in order to attempt to obtain a bank account and deposit checks at Academy Bank Centre:

COUNT	DATE	TRANSACTION
IX	August 17, 2021	Check x3421, in the amount of \$13,600.00, payable to Vac-It-All drawn from Rockwood Bank account ending in x1401 and deposited into Academy Bank account ending in x7773.
X	August 17, 2021	Check x8281, in the amount of \$21,610.00, payable to Vac-It-All drawn from Morton Community Bank account ending in 0850 and deposited into Academy Bank account ending in x7773.

In violation of Title 18, United States Code, Section 1344.

COUNT XI
(Aggravated Identity Theft)

25. The Grand Jury realleges the facts set forth in paragraphs 1 through 24 as if fully set herein.

26. On or about September 29, 2020, within the Eastern District of Missouri,

MICHAEL WORSHAM,

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a

means of identification of another person, to wit, using the name and personal information of D.Q. during his attempted purchase of an automobile, during and in relation to the commission of the felony offense of wire fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1028A.

COUNT XII
(Aggravated Identity Theft)

27. The Grand Jury realleges the facts set forth in paragraphs 1 through 26 as if fully set herein.

28. On or about December 19, 2020, within the Eastern District of Missouri,

MICHAEL WORSHAM,

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, using the name and personal information of B.H. during his application of a loan from Mariner Finance, during and in relation to the commission of the felony offense of bank fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1028A.

COUNT XIII
(Aggravated Identity Theft)

29. The Grand Jury realleges the facts set forth in paragraphs 1 through 28 as if fully set herein.

30. On or about June 24, 2021, within the Eastern District of Missouri,

MICHAEL WORSHAM,

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, using the name and personal information of R.R. during his application of a loan from Mariner Finance, during and in relation to the commission of

the felony offense of bank fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1028A.

COUNT XIV
(Aggravated Identity Theft)

31. The Grand Jury realleges the facts set forth in paragraphs 1 through 30 as if fully set herein.

32. On or about July 19, 2021, within the Eastern District of Missouri,

MICHAEL WORSHAM,

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, using the name and personal information of J.D. during his fraudulent purchase of a vehicle, during and in relation to the commission of the felony offense of wire fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1028A.

COUNT XV
(Aggravated Identity Theft)

33. The Grand Jury realleges the facts set forth in paragraphs 1 through 32 as if fully set herein.

34. On or about July 21, 2021, within the Eastern District of Missouri,

MICHAEL WORSHAM,

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, using the name and personal information of P.G. to open a fraudulent bank account with Regions Bank, during and in relation to the commission of the felony offense of bank fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1028A.

COUNT XVI
(Aggravated Identity Theft)

35. The Grand Jury realleges the facts set forth in paragraphs 1 through 34 as if fully set herein.

36. On or about August 17, 2021, within the Eastern District of Missouri,

MICHAEL WORSHAM,

the defendant herein, knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, to wit, using the name and personal information of D.O. to attempt open a fraudulent bank account with Academy Bank Centre, during and in relation to the commission of the felony offense of bank fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1343 as set forth in Count(s) 1-10, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violations, the amount of which is at least \$200,000.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

Edward L. Dowd III, #61909(MO)
Assistant United States Attorney